



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

### REGION 8

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**JUL 20 2016**

Ref: 8EPR-N

Melany Glossa, Forest Supervisor  
Beaverhead-Deerlodge National Forest  
420 Barrett Street  
Dillon, Montana 59725

Re: Final Supplemental Environmental Impact Statement for the Beaverhead-Deerlodge National Forest Land and Resource Management Plan to Comply with the District Court Order  
CEQ# 20160131

Dear Ms. Glossa:

The U.S. Environmental Protection Agency Region 8 has reviewed the U.S. Department of Agriculture Forest Service's Final Supplemental Environmental Impact Statement (SEIS) for the Beaverhead-Deerlodge National Forest (BDNF) Land and Resource Management Plan (LRMP) to comply with the District of Montana Court Order (Winter Motorized Use). Our comments are provided for your consideration pursuant to our responsibilities and authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA).

### **Project Background**

In an August 27, 2015 Order, the U.S. District Court for the District of Montana directed the Forest Service to disclose its analysis of impacts of snowmobiles on big game wildlife, apply the minimization criteria of the 2005 Travel Management Rule, and update the Revised Forest Plan as appropriate. The purpose of this SEIS is to more thoroughly evaluate and disclose the potential impacts from over snow vehicle (OSV) use on big game wildlife and the resources cited in the minimization criteria. Alternative 6 Modified is the Forest Service's Preferred Alternative, and allocates approximately 40% of the BDNF as a non-motorized winter setting, including all wilderness and recommended wilderness areas. Selection of Alternative 6 Modified in the Record of Decision (ROD) based on this Final SEIS would reaffirm the 2009 Forest Plan ROD. This alternative reduces the amount of BDNF big game habitat open to winter OSV use by approximately 25% compared to the no action alternative (Alternative 1) in order to improve big game protections. Although approximately 80% of the area proposed for closure is seldom or never used by OSVs, those low use areas experience more use in heavy snow years and may experience greater use as OSV technology evolves.

### **Comments and Recommendations**

#### *Analysis of Environmental Impacts*

The EPA recognizes the improved analysis included in the Final SEIS that relates big game use of the BDNF landscapes (including timing and location of use) to management goals for big game and the location and intensity of OSV use. The improved analysis has increased our understanding of how the Forest Service is minimizing disturbance to individuals and populations of the species analyzed.

Specifically, we note the following examples of sections, information and analyses that were helpful in interpreting the results of the Forest Service's analysis of environmental impacts:

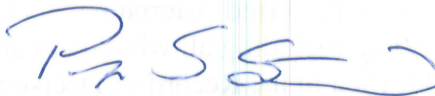
- The "SEIS Analysis Methodology;"
- New/improved survey data for moose, mule deer, antelope, white-tailed deer and mountain goat;
- Management objectives for mule deer and bighorn sheep;
- Improved analysis of elk survey data and identification of disturbance to elk and moose in the Boulder River and Gravelly Landscapes, as well as increased protections that will be implemented in these landscapes;
- Disclosure of declines in mountain goat population (not thought to be related to OSV use) and improved analysis of potential effects to this species;
- Additional information on why risk of effects to grizzly bears is low; and
- Responses to concerns about forest resources cited in the minimization criteria, as well as the Forest Service's explanation of how OSV use is mostly restricted to higher elevations.

#### *Adapting to Evolving OSV Technology*

Additional wildlife protection may be needed in the future if snowmobile technology enables expansion of use into big game habitat areas that are not currently accessible. Accordingly, it will be important to ensure that management of forest resources keeps pace with evolving OSV technology. We recommend that the ROD include a plan for monitoring, in strategically selected locations, the degree to which OSV usage expands onto areas that are allocated as a motorized setting but currently seldom or never experience winter motorized travel. We note that there is a management action (Conservation Strategy) indicated in Chapter 5 of the BDNF LRMP if a downward trend in reference populations of sensitive plants is observed. We recommend that the ROD also include a similar commitment to management action if new adverse big game impacts occur as a result of changes in OSV use.

We appreciate the opportunity to review this project and have not identified any potential impacts requiring substantive changes to the Forest Service's Preferred Alternative. If you have any questions, please contact me at 303-312-6704, or Dr. Melissa McCoy of my staff at 303-312-6155 or [mccoy.melissa@epa.gov](mailto:mccoy.melissa@epa.gov).

Sincerely,



Philip S. Strobel  
Director, NEPA Compliance and Review Program  
Office of Ecosystems Protection and Remediation

